## ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION AND PLAN REVIEW BULK STORAGE FACILITIES

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 6**

1445 Ross Avenue 6 SF PO Dallas Texas 75202 2733

SPCC Case # FY-INSP-090182	FRP ID FRP-06-AR-00053 ~ ~ ~ ~
SPCC Inspection Date: 8/24/2009 Time 9 00 AM	FRP Inspection Date. 8/24/2009 Time. 9 00 AM
Name of Facility <u>Ft Smith Terminal</u>	20° Source EDD
Latitude <u>N 35°18 34"</u> Longitude <u>W 94°23</u>	
Facility Address/Location <u>8101 Highway 71 South</u> Tribal Land Reservation Name	
City <u>Ft Smith</u> County/Parish <u>Seba</u>	
Facility Contact <u>Douglas Hammer</u>	Title _Supervisor Operation & Management
Telephone Number <u>479-646 1721</u>	Email
Name of ⊠ Owner/⊠ Operator <u>Magellan Pipeline Col</u> Address <u>One Williams Center</u> P O Box 2186	mpany, LP
City <u>Tulsa</u>	
Contact	
Telephone Number <u>918 574 7310</u>	
Synopsis of Business Storage and distribution of refine	ed petroleum products
How many employees work at this facility?	NAICS #
If unmanned how many employees maintain this facility	2
Is the Facility Unattended Attended Daily (8 hr)	☐ Daily (24 hr) ☐ Periodically )
Route of Entry to Waterway Northwest to Mill Creek N	North to Arkansas River
Distance to waterway (in feet)	_
Relative direction to water body <u>Northwest</u>	Elevation above water body (ft)
SPCC inspector name Tom McKay	FRP inspector name Don Smith
Team members Don Smith Mike Clonts	Team members Tom McKay Mike Clonts
SPCC Plan review by: Tom McKay	FRP review by Mike Clonts
Date of review 8/1/2009	Date of review:
Acknowledgeme	ent of Inspection
Company Contact	Title
Inspector Tom McKay	Title Inspector EPA/SEE

9490489

Memorandum Of Understanding (check all applicable descriptions)										
Non Transportation Related Transportation Related				<del></del>						
Non Transportation Related □ USCG □ MMS		iateu	□ ops							
			Facili	ل						
Onshore Oil	<del></del>			., .,	Offshore	- Oil				
☐ Production		Orilling/	/workover				oduction and	Wor	kover	
☑ Bulk Storage (check a	all applicable des	criptions	s)							
☐ Aviation	☐ Fede	ral Faci	ility		Petroleum	Dıstnl	outor 🔲	Se	rvice St	ation
☐ Anımal Fats & Oils	☐ Gathe	nng Fa	acility	$\boxtimes$	Petroleum I	Marke	ting 🔲	Tre	ansporte	er (Truck/Rail)
☐ Asphalt Paving	☐ Hosp	ıtal		Te	rmınal			Trib	oal	
☐ Asphalt Coatings		actunn			Pipeline Bu	lk Sto	rage	Utı	lities	
☐ Auto Dealership	Lub	e/Grea:	se		Railroad			Sta	ate	
☐ Bulk Packing	☐ Marın				Remediatio	n/Rec	ycling	Lo	cal	·
☐ Concrete/Cement	Militar	У			Refinery			Ot	her	]
☐ Crude Petroleum	☐ Minin	•			Rental Car	•				_!
☐ Farm			Liquids		Sand & Gra		-			1
	Petrod	chemica	al		School/Uni	versit	<u>y</u>			
		A	pplicable Sto	rage	Containe	rs				
			(check all applic	able	descriptions)					
	Tanks		Inderground		☑ Drums		In plant		Other	containers
_			Storage Tanks		_	bib	ing	—		
☐ Mobile/portable stora	age Units	_	urface undments		Lagoons		Equipment	-		
			<u> </u>	E	etlen			<u> </u>		_
			Storage (check all applic							
☑ Transferring			☐ Processing		Gathering	ПС	onsuming/Usi	ng	☐ Op	perations
			Facility Store	ige (	Capacities		<u> </u>			
AST Storage Capacity (ga	al)		UST Storage	Capa	acity (gal)		Total Facility	v Ca	pacity (	gal)
_8,329,719	<del></del>						_8,329,719	-		
Types of Oil Stored	-		. <del>.</del>							
☐ Crude oil       Ga	soline 🔲	Diesel	l ☐ Fuel d	oil	☐ Jet fue	1	☐ Vegetabl	e oil	/anımal	fats grease
Other _Distilates, Ad	ditives, Water/	Oil					_			
Qualified Facility Thresholds ☐ <5 000 Gallons				☐ YES 🖾 NO						
The aggregate aboveground storage capacity is 10 000 Gallons or less 112 3(g)(1) AND ☐ YES ☒ NO				☐ YES 🖾 NO						
The facility has had no sir	nale discharge	exceed	ling 1 000 U.S.	gallo	ns and the	acility	has had no t	wo		YES NO
discharges exceeding 42	US gallons w	thin an	y twelve month	perio	d in the tree	years	s prior to the S	SPC		
Plan self-certification date than three years (Note (										
included in this qualification	on determination	nai 1 <del>0</del> 8 n ) 112	3(g)(2)	นเชส	סוסום מטוט 0	wai	or folloligili g	11 <del>0</del> 11	·	
Is the facility considered a Qualified Facility? If YES to both questions above AND the owner/operator has self certified the SPCC Plan then check YES and complete Appendix A				☐ YES 🖾 NO						

GENERAL APPLICABILITY - 40 CFR 112 1	
GENERAL APPLICABILITY - 40 CPR 112 I	<u> </u>
Does the facility maintain an aggregate aboveground oil storage capacity of over 1 320 gallons and/or completely b	uned oil
storage capacity of over 42 000 gallons?	
⊠ YES □ NO	
and	
is the facility engaged in drilling producing gathering storing processing refining transferring distributing using	or
consuming oil and oil products which due to its location could reasonably be expected to discharge oil into or upon	the
navigable waters of the United States (as defined in 40 CFR 110 1)?	
☑ YES ☐ NO	
If YES to both, the facility is regulated under 40 CFR 112	
Note The following storage capacity is not considered in determining applicability of SPCC requirements	
Completely buried tanks subject to all the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281	
Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Manage	ement
Service as defined in Memoranda of Understanding dated November 24 1971 and November 8 1993	
Any facility or part thereof used exclusively for wastewater treatment and not used to satisfy SPCC requirements	
Containers smaller than 55 gallons	
Permanently closed containers	

FACILITY RESPONSE PLAN (FRP) APPLICABILITY		
Does the facility transfer oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42 000 gallons?	YES NO	
Or  Does the facility have a total oil storage capacity of at least 1 million gallons  And  at least one of the following is true	X YES INO	
The facility does not have secondary containment sufficiently large enough to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation	YES NO	
The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments	YES INO	
The facility is located such that a discharge would shut down a public drinking water intake	☐ YES 🖾 NO	
The facility has had a reportable discharge greater than or equal to 10 000 gallons in the past 5 years	☐ YES 🖾 NO	
If YES to any of the above the facility is a non transportation related onshore facility required to prepare and implement a FRP as outlined in 40 CFR 112 20		
Does the facility maintain a FRP? ⊠ YES □ NO □ Not Required FRP Number FRP-06 AR-000	53	
Does the Plan include a signed copy of the Certification of the Applicability of the Substantial Harm Criteria per 40 CFR Part 112 20(e)? Attachment C II	☑ YES ☐ NO	
Comment		
	<u> </u>	

REQUIREMENTS FOR PREPA	RATION AND IMPLEME	INTATION OF	F A SPCC Plan — 40 CFR 112 3			
Facility Startup Date	Date of initial SPCC Plan	preparation	Current Plan version (date/number) _6/13/2003			
For facilities (excluding farms) in operation prior to August 16 2002 was the Plan amended and implemented by July 1 2009?  112 3(a) YES NO NA						
For facilities (excluding farms) beginning operation between August 17 2002 and July 1 2009 is the Plan prepared and fully implemented by July 1 2009? 112 3(a) YES NO X N/A						
For facilities beginning operation aft	er July 1 2009 was the Pla	n implemented	before beginning operations? 112 3(b) & (c)			
Is an SPCC Plan prepared? 🛛 Yi	ES NO N/A					
Professional Engineer certification i	nust include statements that	the PE attests	s <b>to</b> 1123(d)			
He/she is familiar with the requirem	ents of the SPCC rule (i)	X YES □	NO 🗆 N/A			
He/she or his/her agent has visited	and examined the facility (i	i) 🛛 YES	□ NO □ N/A			
The Plan has been prepared in acc standards and with the requiremen			cluding consideration of applicable industry			
Procedures for required inspections	and testing have been esta	blished(ıv)	YES NO N/A			
The Plan is adequate for the facility	_(v)_ YES NO	⊠ N/A				
Is the SPCC Plan fully PE certified?		NO Date o	of Certification 6/13/2003			
Name of Professional Engineer <u>f</u> License Number <u>6982</u>	Robert D. Sholl	State AR_				
			· · · · · · · · · · · · · · · · · · ·			
Is an SPCC Plan available for review (During normal working hours) 112			Plan maintained on site?  YES  NO hours/day excluding oil production facilities)			
	5(0)(2)	112 3(e)(1)	Trouble of Production (Identica)			
AMENDMENT OF SPCC PLAN	AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112 4					
Have there been reportable enils at						
Have there been reportable spills at Or has the facility had two spills of	t this facility of more than 1 0	000 gallons? 11	2 4(a) YES NO N/A			
Or has the facility had two spills of If YES to either was information suit	t this facility of more than 1 0 more than 42 gallons in the	000 gallons? 11	2 4(a) YES NO NA 82 112 4(a) YES NO NO NA			
Or has the facility had two spills of If YES to either was information sull Date of spills	t this facility of more than 1 0 more than 42 gallons in the l bmitted to the RA as require	000 gallons? 11 past 12 months d in §112 4(a)?	2 4(a)			
Or has the facility had two spills of If YES to either was information suit	t this facility of more than 1 0 more than 42 gallons in the l bmitted to the RA as require	000 gallons? 11 past 12 months d in §112 4(a)?	2 4(a)			
Or has the facility had two spills of If YES to either was information sul Date of spills  If applicable have changes required	t this facility of more than 1 0 more than 42 gallons in the l bmitted to the RA as require	000 gallons? 11 past 12 months d in §112 4(a)?	2 4(a)			
Or has the facility had two spills of If YES to either was information suld Date of spills  If applicable have changes required YES NO N/A	t this facility of more than 1 0 more than 42 gallons in the l bmitted to the RA as require	000 gallons? 11 past 12 months d in §112 4(a)?	2 4(a)			
Or has the facility had two spills of If YES to either was information suld Date of spills  If applicable have changes required YES NO N/A	t this facility of more than 1 0 more than 42 gallons in the l bmitted to the RA as require	000 gallons? 11 past 12 months d in §112 4(a)?	2 4(a)			

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—4	O CFR 112 5			
Has there been any change of facility design (construction operation or maintenance) that could affect the facility's potential for discharge? (112 5a) YES NO NA				
If YES was the amendment within 6 months and was a plan change \( \Boxed{\text{T}} \) Yes	☐ No or a design char	nge 🗌 Yes 🔲 No		
Is the SPCC Plan reviewed and evaluated every 5 years? ☑ YES ☐ NO [	□ N/A			
If amended and implemented (if necessary) is it documented in the Plan (sign of	ff sheet)? 112 5(b) 🛛 YE	ES 🗌 NO 🗌 N/A		
Date of latest change Certification #				
Name of PE certifying amendments 112 5(c) (Except for self certified Plans)				
License # State Date of Certification				
Reason for amendment				
Comment				
		1		
GENERAL REQUIREMENTS FOR SPCC PLANS 112 7(a-d)	Plan Review	Field Verification		
GENERAL REQUIREMENTS FOR SPCC PLANS 112 7(a-d)  Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 112 7	Plan Review  □ YES MINO □ N/A	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127		Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has		Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name Dom Lame		Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name  Dong Hammer  Mgmt Personnel Title  Superniae Operation	TYES THE NO INVA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name  Does the Plan format follow the sequence in the rule? 1127 or	TYES MINO NA  YES NO NA  YES NO NA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name  Does the Plan format follow the sequence in the rule? 1127 or if no is a cross reference provided?  Does the Plan call for additional facilities or procedures methods or equipment	TYES MINO NA  YES NO NA  YES NO NA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name  Does the Plan format follow the sequence in the rule? 1127 or lf no is a cross reference provided?  Does the Plan call for additional facilities or procedures methods or equipment not yet fully operational?	YES NO NA  YES NO NA  YES NO NA  YES NO NA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name  Does the Plan format follow the sequence in the rule? 1127 or if no is a cross reference provided?  Does the Plan call for additional facilities or procedures methods or equipment not yet fully operational?  If yes are the following items discussed in the Plan?	YES NO NA  YES NO NA  YES NO NA  YES NO NA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name  Mgmt Personnel Title  Supervise  Upare Stein  Does the Plan format follow the sequence in the rule? 1127 or if no is a cross reference provided?  Does the Plan call for additional facilities or procedures methods or equipment not yet fully operational?  If yes are the following items discussed in the Plan?  Installation  Start up	TYES MINO NVA  YES NO NVA  YES NO NVA  YES NO NVA  YES NO NVA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name Down Lammer  Mgmt Personnel Title Supervise Coperation  Does the Plan format follow the sequence in the rule? 1127 or if no is a cross reference provided?  Does the Plan call for additional facilities or procedures methods or equipment not yet fully operational?  If yes are the following items discussed in the Plan?  Installation Start up  Does the Plan include a discussion of conformance with SPCC requirements?	TYES MINO NVA  YES NO NVA  YES NO NVA  YES NO NVA  YES NO NVA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 1127  Mgmt Personnel Name	TYES MO NO NA  YES NO NO NA	Field Verification		
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 112 7  Mgmt Personnel Name Down Hammer  Mgmt Personnel Title Supervise Copyrights  Does the Plan format follow the sequence in the rule? 112 7 or if no is a cross reference provided?  Does the Plan call for additional facilities or procedures methods or equipment not yet fully operational?  If yes are the following items discussed in the Plan?  Installation Start up  Does the Plan include a discussion of conformance with SPCC requirements?  112 7(a)(1)  Does the Plan deviate from SPCC requirements? 112 7(a)(2)	TYES MO NO NA  YES NO NO NA	Field Verification		

Does the Plan contain a facility diagram? 112 7(a)(3)



☐ YES ☐ NO ☑ N/A

☐ YES ☐ NO ☑ N/A

Does the diagram include		ļ
The location and contents of each container? and	☐ YES ☐ NO 🖾 N/A	☐ YES ☐ NO 図 N/A
Completely buried storage tanks? and	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO 図 N/A
Transfer stations? and	☐ YES ☐ NO 図 N/A	☐ YES ☐ NO 🖾 N/A
Connecting pipes?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO 図 N/A
Is there a description in the Plan of the physical layout of the facility and includes 112 7(a)(3)	⊠ YES □ NO □ N/A	1
The type of oil in each container and its storage capacity? 112 7(a)(3)(i)	MYES NO NA	ZYES NO NA
Discharge prevention measures including procedures for routine handling of products? 112 7(a)(3)(ii)	☑ YES ☐ NO ☐ N/A	DYES   NO   N/A
Discharge or drainage controls such as secondary containment around containers and other structures equipment and procedures for the control of a discharge? 112 7(a)(3)(iii)	☑ YES ☐ NO ☐ N/A	OYES ONO ON/A
Countermeasures for discharge discovery response and cleanup (including facility and contractor resources)? 112 7(a)(3)(iv	YES NO MIN/A	☐ YES ☐ NO 🖾 N/A
Methods for disposal of recovered materials in accordance with applicable legal requirements? 112 7(a)(3)(v)	☐ YES ☐ NO 🖸 N/A	
Contact list and phone numbers for the facility response coordinator NRC cleanup contractors and federal state and local agencies who must be notified in the case of a discharge as described in §112 1(b)?	☐ YES ☐ NO 🖾 N/A	
Does the Plan include information and procedures for reporting a discharge (exact location phone number date/time of material discharged quantity actions taken evacuations notifications (names/organizations etc.)? 112 7(a)(4)	☑ YES ☐ NO ☐ N/A	
Does the Plan include procedures to use when a discharge may occur?  112 7(a)(5)	YES NO NA	
Does the Plan include a prediction and description of major equipment failure(s) that could result in a discharge from the facility per 40 CFR 112 7(b)?	☑ YES ☐ NO ☐ N/A	1
☑ direction ☑ rate of flow and ☑ total quantity of oil		
Does the Plan discuss appropriate containment and/or diversionary structures/equipment (dikes berms retaining walls curbing culverts gutters/drain systems weirs boom diversion/retention ponds sorbent material) and is sufficiently impervious to contain oil per 40 CFR 112 7(c)	☑ YES ☐ NO ☐ N/A	MYES NO NA
Has it been determined in the Plan that the installation of structures or equipment (containment) is not practicable ? 112 7(d) If YES check ☐ then 40 CFR Part 109 Checklist must be filled out and	☐ YES ☐ NO 🖾 N/A	
Is the impracticability clearly demonstrated?	☐ YES ☐ NO 🖾 N/A	
For bulk storage containers is periodic integrity testing of containers and leak testing of the valves and piping associated with the container conducted?	YES INO INVA	□YES □NO 図N/A
Is a strong contingency plan per 40 CFR 109 provided? 112 7(d)(1)	☐ YES ☐ NO ☑ N/A	
Is a written commitment of manpower equipment and material (to control and remove any quantity of oil discharged) provided in the SPCC plan? 112 7(d)(2	☐ YES ☐ NO 🖾 N/A	

Comment		

The digital version of the Spill Prevention Control and Countermeasure (SPCC) plan did not contain a signed management approval certification

INSPECTIONS, TESTS, AND RECORDS 112 7(e)	Plan Review	Field Verification
Are inspections and tests required by 40 CFR 112 conducted in accordance with written procedures developed for the facility? 112 7(e)	☑ YES ☐ NO ☐ N/A	TYES NO NA
If Yes are written procedures records of inspections and/or customary business records		
Signed by the appropriate supervisor or inspector?	⊠ YES □ NO □ N/A	YES NO NA
Kept with the SPCC Plan?	☑ YES ☐ NO ☐ N/A	PYES   NO   N/A
Maintained for a period of three (3) years?	⊠ YES □ NO □ N/A	DYES DNO DNA
Comment	·	

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES 112 7 (f)	Plan Review	Field Verification
Are oil handling personnel trained on 112 7(f)(1)		
The operation and maintenance of equipment to prevent the discharge of oil?	⊠ YES □ NO □ N/A	DYES   NO   NA
Discharge procedure protocols (discovery and notification)?	☑ YES ☐ NO ☐ N/A	DYES DNO NA
Applicable pollution control laws rules and regulations?	☐ YES ☑ NO ☐ N/A	YES   NO   N/A
General facility operations?	☐ YES ☑ NO ☐ N/A	YES NO NA
The contents of the Plan?	☑ YES ☐ NO ☐ N/A	YES NO NA
Is there a designated person accountable for spill prevention? 112 7(f)(2)	MYES NO NA	YES NO NA
Name and title of individual? <u>Craig Doty</u>		
Are spill prevention briefings scheduled periodically? 112 7(f)(3)	YES NO NA	YES NO NA
What is the schedule (minimum at least once a year)?		
☐ Monthly ☐ Quarterly ☐ Semi annually ☒ Annual		]



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SECURITY (excluding oil production facilities) 112 7(g)	Plan Review	Field Verification
Environmental Equivalence	1	
Qualified Facility [ (if the facility is a qualified facility complete section 112 7(k) and Appendix A of this checklist.)		
Is the facility fully fenced and are entrance gates locked and/or guarded when not in production or unattended? 112 7(g)(1)  EE QF	☑ YES ☐ NO ☐ N/A	□/YES □ NO □,N/A
Are master flow and drain valves that permit direct outward flow to the surface secured in closed position when in a non operating or standby status? 112 7(g)(2	☑ YES ☐ NO ☐ N/A	CYES NO NA
FE □ QF □		
Are starter controls on pumps locked in the off; position or located at a site accessible only to authorized personnel when in non operating or standby status? 112 7(g)(3)	☑ YES ☐ NO ☐ N/A	TYES NO NA
Are transfers at loading/unloading (facility pipeline/piping) connections securely capped or blank flanged when not in service or standby status? 112 7(g)(4)	☑ YES ☐ NO ☐ N/A	√G YES □ NO, □ N/A
EE □ QF □		
Does the facility lighting appear to be adequate (commensurate with the type/location of the facility) to facilitate the discovery of spills during hours of darkness and to deter vandalism? 112 7(g)(5)  EE QF	☑ YES I NO I N/A	YES NO NA
Comment ~		

The SPCC plan did not contain all of the requisite training protocols for oil handling personnel The inspection

Comment

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FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK, (excluding offshore facilities) 112 7(h j)	Plan Review	Field Verification
Environmental Equivalence		
Does the facility have a loading/unloading/transfer area? If yes	☑ YES ☐ NO ☐ N/A	TYES NO NA
Does the facility have containment consistent with 112 7(c) as required by 112 1(a)(1) to prevent a discharge of oil to the waters of the U S?	YES NO NA	☐YES ☐ NO ☐ N/A
Does drainage from loading/unloading areas and/or locations adjacent to the loading or unloading racks flow to catchment basin(s) or	⊠ YES □ NO □ N/A	DYES NO NA
Treatment system? 112 7(h)(1)	☐ YES ☐ NO 🖾 N/A	YES NO DAVA
If NO to either is quick drainage system used?	☐ YES ☐ NO Ø N/A	O YES ONO ONA
Are containment systems designed to hold at least the maximum capacity of any largest single compartment of a tank car or tank truck (when at the loading/unloading rack)?	☑ YES ☐ NO ☐ N/A	DYES   NO   N/A
Is there a system used to prevent departure (tank trucks/tank cars) before completing the disconnection from transfer lines? 112 7(h)(2) EE	☑ YES ☐ NO ☐ N/A	YES NO NA
If YES are there		
Interlocked warning lights? or	TYES NO BYWA	TYES NO NA
Physical barrier systems (i e wheel locks)? or	☐ YES ☐ NO 🖾 N/A	YES NO PAVA
Warning signs? or	MYES NO NA	YES NO NA
Vehicle brake interlock system?	☐ YES ☐ NO M N/A	☐ YES ☐ NO ☐ HVA
Are tank cars/tank trucks lower most drains and all outlets inspected for discharges prior to filling and departure? 112 7(h)(3) (note do procedures ensure that they are tightened adjusted or replaced to prevent liquid discharge while in transit)	YES NO NA	YES NO NA
EE 🗖		
Comment		
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Does the Plan include a risk analysis and/or evaluation of field-constructed aboveground tanks for brittle fracture after tank repair/alteration/ or when a change in service has occurred? 112 7(i)	□YES □ NO SEÎN/A {	NO (⊠ NA
Comment		
~		
Does the Plan include a discussion of conformance with applicable requirements	· · · · · · · · · · · · · · · · · · ·	☐ YES ☐ NO 図 N/A
of the SPCC rule or any applicable state rules regulations and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR Part 112? 112 7(j)	YES INO SINVA	LI TES LINO MINA
Comment ',		
) y 7		
1 Am w 1, 1		
QUALIFIED OIL FILLED OPERATIONAL EQUIPMENT SECONDARY CONTAINMENT OPTION 112 7(k)	Plan Review	Field Verification
Is there qualified oil filled operational equipment at the facility? (Oil storage containers and associated piping intrinsic to the operation of the equipment in which the oil is present solely to support the function of the apparatus or the device).  Has the facility qualified for the secondary containment option? 112 7(k)	□YES □ NO TE NA T	☐ YES¹ ☐ NOr ☑ N/A≯
Has a single reportable discharge as described in §112 1(b) from any oil filled operational equipment exceeding 1 000 U'S gallons occurred within any 12 month period within the three years prior to Plan certification date?	☐ YES ☐ NO: MI N/A	YES NO NÃ
Have two reportable discharges as described in §112 1(b) from any oil filled operational equipment each exceeding 42 U S gallons occurred within any 12 month period within the three years prior to Plan certification date?  If YES for either secondary containment is required. See 112 7(c)	☐ YES ☐ NO 🗵 N/A	□ YES □ NO 図 N/A
If NO and no secondary containment is provided then		
Are facility procedures for Inspections/monitoring program established and documented? 112°7(k) (2)(i)	YES NO NA	☐ YES ☐ NO ☑ N/A^
Does the facility maintain a Facility Response Plan? 112 7(k) (2)(ii)	YES NO NA	☐ YES ☐ NO ☑ N/A
Is there a Contingency plan following 40 CFR part 109 (see Appendix D checklist) provided? AND	☐ YES ☐ NO ☑ N/A	YES NO NA
Is there a written commitment of manpower equipment and materials required to control and remove any quantity of oil discharged that may be harmful?	YES NO NA	☐ YES ☐ NO 図 ŅA

Comment		
FACILITY DRAINAGE 112 8(b)	Plan Review	Field Verification
Environmental Equivalence [ (If environmental equivalence declared by PE complete		
Appendix D of this checklist)		
Is drainage from diked storage areas restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system? 112 $8(b)(1)$ EE	☑ YES ☐ NO ☐ N/A	YES NO NA
If YES is the facility designed to control such discharge?	MYES NO NA	YES NO NA
Is drainage from diked storage areas that drain directly into a watercourse restrained via manual open and closed designed valves? 112 8(b)(2) If YES	☑ YES ☐ NO ☐ N/A	YES NO NA
EE 🗖		
is runoff rainwater from diked areas inspected such that it will not cause a harmful discharge (as defined in 40 CFR 110)? 112 8(c)(3)(ii)	☑ YES ☐ NO ☐ N/A	ZYES   NO   N/A
Are valves opened and resealed under responsible supervision?	☑ YES ☐ NO ☐ N/A	YES NO NA
Are adequate records (or NPDES permit records) of dike drainage events maintained? 112 8(c)(3)(iv)	YES NO NA	YES NO NA
Does drainage from undiked areas flow into catchment basins ponds or	☑ YES ☐ NO ☐ N/A	YES NO NA
lagoons designed to retain oil or return it to the facility? 112 8(b)(3)		
If YES is the catchment basin located in areas not subject to periodic flooding?	☑ YES ☐ NO ☐ N/A	ØYES □ NO □ N/A
If NO for the final discharge of all ditches inside the facility is there a diversion system to retain spills in the facility? 112 8(b)(4)	□YES □NO 図N/A	YES NO THA
Is drainage water continuously treated in more than one treatment unit in the facility? 112 8(b)(5)	YES NO NA	☐ YES ☐ NO ☑ N/A
If Yes are two lift" pumps provided of which one is permanently installed or is the drainage system engineered to prevent a discharge in case of equipment failure or human error?	☐ YES ☐ NO ☑ N/A	□YES □NO 図N/A
Comment		

BULK STORAGE CONTAINERS 112 8(c) (See Container Inspection Forms)	Plan Review	Field Verification
Environmental Equivalence		
Qualified Facility (If the facility is a qualified facility' complete section 112 7(k) and Appendix A of this checklist.)		
Is the material and construction of containers compatible to the oil stored and to the conditions of storage such as pressure and temperature etc ? 112 $8(c)(1)$	☑ YES ☐ NO ☐ N/A	DYES   NO   N/A
EE []		
Do all container installations have secondary containment (Note drainage trench enclosures that terminate to a facility catchment basin or holding pond may be used)? 112 8(c)(2) If Yes	☑ YES ☐ NO ☐ N/A	DXÉS   NO   NA
(Can not use Environmental Equivalence for this part)		
Will the containment(s) hold the capacity of the largest single container plus sufficient freeboard for precipitation?	☑ YES ☐ NO ☐ N/A	YES NO NA
Are containment systems including walls and floors sufficiently impervious to contain discharged oil?	MYES NO NA	DYES   NO   N/A
Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse? If YES	☑ YES ☐ NO ☐ N/A	YES   NO   N/A
Are bypass valves on diked areas sealed closed when not draining uncontaminated rainwater? 112 $8(c)(3)(i)$	☑ YES ☐ NO ☐ N/A	TYES INO INA
Is retained rainwater inspected to ensure that its presence will not cause a discharge as described in §112 1(b)? 112 8(c)(3)(ii) EE	☑ YES ☐ NO ☐ N/A	YES NO NA
Are bypass valve opened and resealed under responsible supervision?  112 8(c)(3)(iii)  EE	☑ YES ☐ NO ☐ N/A	TYES INO INA
Are adequate records of drainage maintained? 112 8(c)(3)(iv) EE	YES NO NA	TYES NO NA
Are there completely buried metal storage tanks at the facility? 112 8(c)(4) EE	YES NO NA	YES NO NA
If YES are they regulated under 40 CFR part 280 or state program approved under 40 CFR part 281? 112 1(d)(2)(i) If NO	YES NO NA	YES NO NA
Were they installed after January 10 1974 are tanks protected from corrosion (compatible with soil conditions)? and	□YES □ NO 図 N/A	□YES □NO 🗵 N/A
Are tanks subject to regular leak testing?	YES NO NA	□ YES □ NO 🖾 N/A
Are there partially buried containers at the facility? 112 8(c)(5)	☐ YES ☐ NO 図 N/A	YES NO NA
If YES are buried sections protected from corrosion (compatible with local soil conditions)?	YES NO NA	YES NO NA
Does the Plan indicate that visual inspections of the outside of tanks are performed? 112 8(c)(6) and EE	☑ YES ☐ NO ☐ N/A	DYES DINO DINA

	t this facility subject to periodic integrity testing or other e shell testing (by qualified personnel) whenever e? 112 $8(c)(6)$ EE $\square$ $QF$ $\square$	□ YES □ NO ☑ N/A	YES NO NA
What type(s) and frequen	cy of test?		
Hydrostatic? or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO MIN/A
Magnetic Particle? or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Penetrant dye? or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	YES NO NA	☐ YES ☐ NO ☑ N/A
Ultrasonic? or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Radiographic? or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☑ N/A	YES NO NA
Acoustic Emissions? or	' ☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	YES NO NA	☐ YES ☐ NO ☑ N/A
Laser? or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	□ YES □ NO ☑ N/A	☐ YES ☐ NO 図 N/A
Other?	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO 図 N/A	☐ YES ☐ NO 🖾 N/A
Describe		_	
Are companson records of container/tank inspections (or customary business records/tests) maintained? 112 8(c)(6) EE QF		☑ YES ☐ NO ☐ N/A	□YES □ NO □ N/A
If YES do the records	s indicate that inspection are conducted on		
Tank supports and	foundations?	☑ YES ☐ NO ☐ N/A	YES NO NA
Signs of deteriora	ition?	☑ YES ☐ NO ☐ N/A	THES INO INVA
Discharges?		☑ YES ☐ NO ☐ N/A	TYES NO NA
Accumulation of or	ıl ınsıde dıked areas?	☑ YES ☐ NO ☐ N/A	ØYES □ NO □ N/A
Are internal heating coils i	utilized? 1128(c)(7) If YES EE	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO M N/A
Do steam return/exha	ust lines discharge into open watercourse?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO 🛛 N/A
	ust discharging into an open watercourse monitored or tling tank skimmer or other separation or retention	☐ YES ☐ NO 🖾 N/A	□ YES □ NO 🔯 NVA
Is each containers installation engineered or updated in accordance with good engineering practice? 112 8(c)(8)		☑ YES ☐ NO ☐ N/A	ØYES □ NO □ N/A
(One or more of the follow	wing must be utilized ) EE		
Do tanks have audible	e or visual high liquid level alarms? 112 8(c)(8)(i) or	☑ YES ☐ NO ☐ N/A	ZYES NO NA
High liquid level pump	cutoff devices? 112 8(c)(8)(n) or	☐ YES ☐ NO 🖾 N/A	YES NO DANA

Audible or code signal communications between gauger and pumping station? 112 8(c)(8)(iii) or	YES NO NA	YES NO DANA
A system of determining liquid level in containers such as digital computers telepulse or direct vision gauges? 112 8(c)(8)(iv)	☑ YES ☐ NO ☐ N/A	□YES □ NO □ N/A
Are liquid level sensing devices regularly tested? 1128(c)(8)(v)	PYES   NO SPN/A	DYES   NO   N/A
Are effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112 1(b)?  112 8(c)(9)  EE	YES NO NA	TYES   NO   N/A
Are visible discharges which result in a loss of oil from the container including but not limited to seams gaskets piping pumps valves rivets and bolts are promptly corrected and oil in diked areas is promptly removed? $112.8(c)(10)$	☑ YES ☐ NO ☐ N/A	☐YES ☐ NO ☐ N/A
<i>EE</i> □		
Are there mobile or portable storage units at this facility? 112 8(c)(11) If YES	☑ YES ☐ NO ☐ N/A	TYES NO NA
Are storage containers positioned to prevent discharged oil from reaching navigable water?	☑ YES ☐ NO ☐ N/A	DYES   NO   N/A
Is there adequate secondary means of containment with sufficient capacity to contain the largest single compartment or container and sufficient	☑ YES ☐ NO ☐ N/A	DYES ONO ONA
freeboard for precipitation provided?  Comment		
Comment		
	Plan Review	Fleid Verification
FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY	Plan Review	Field Verification
FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY PROCESS112 8(d)  Environmental Equivalence	Plan Review  ☑ YES □ NO □ N/A	Field Verification
FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY PROCESS112 8(d)  Environmental Equivalence  (If environmental equivalence declared by PE complete Appendix D of this checklist)  Are buried piping corrosion protected with protective wrapping and/or coating?		
FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY PROCESS112 8(d)  Environmental Equivalence	☑ YES □ NO □ N/A	□YES □ NO □ N/A □YES □ NO ☑ N/A □YES □ NO ☑ N/A
FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY PROCESS112 8(d)  Environmental Equivalence	MYES NO NA	□YES □ NO □ N/A

Are aboveground valves piping and appurtenances such as flange joints expansion joints valve glands and bodies catch pans pipeline supports locking of valves and metal surfaces inspected regularly? 112 8(d)(4)	YES NO NA	YES NO NA
At what frequency?		
Daily or	YES NO NA	☐ YES ☐ NO ☐ NVA
Weekly or	□ YES □ NO 🔯 N/A	YES NO NA
Monthly or	MYES NO NA	TYES NO NA
Bi monthly or	□YES □NO 図N/A	YES NO NA
Annual or	□YES □NO 図N/A	YES NO DAVA
Semi annual or	☐ YES ☐ NO 🖾 N/A	YES NO DAVA
Other	□ YES □ NO 🔯 N/A	YES NO DAVA
Is periodic integrity and leak testing of buried piping (at the time of installation modification construction relocation or replacement) conducted? 112 8(d)(4)	⊠ YES □ NO □ N/A	□/ES □ NO □ N/A
<i>EE</i> 🗆		
At what frequency?		
Daily or	☐ YES ☐ NO Ø N/A	☐ YES ☐ NO ☐ N/A
Weekly or	□YES □ NO 🔯 N/A	YES NO NA
Monthly or	□ YES □ NO 🔯 N/A	☐ YES ☐ NO ☐ N/A
Annual or	□ YES □ NO 🖾 N/A	YES NO NA
Other <u>Upon modification</u>	☑ YES ☐ NO ☐ N/A	YES NO NA
Is vehicle traffic warned of aboveground piping or other oil transfer operations?  112 8(d)(5)  EE	MYES NO NA	YES NO NA
Comment		

### Qualified Facilities Checklist

### Appendix A Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112 3(g) A qualified facility's Plan whether certified by a PE or self-certified must comply with all of the applicable requirements of §112 7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

SPCC Inspection # FY INSP	' <u>-090182</u> I	2	<del></del>
112 6-Qualified Facility Plan Requirements	Yes	No	N/A
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan?			X
If NO, see requirements for 112 3(d) above If YES, did the owner/operator certify in the Plan that			
ှင်း(1) He or she is familiar with the requirements of 40 CFR part 112			x
(2) He or she has visited and examined the facility			X
(3) The Plan has been prepared in accordance with accepted and sound industry practices and			х
(4) Procedures for required inspections and testing have been established			X.
(5) The Plan is being fully implemented			x
(6) The facility meets the qualification criteria set forth under §112 3 (g)			x
(7) The Plan does not deviate from any requirements as allowed by §112 7(a)(2) and 112 7(d) except as described under §112 6(c)			x
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan s full implementation			X
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			X
If YES Is the certification of any technical amendments in accordance with the provisions above (§112 6(a))?			X
(c)(1) and (d)(1) Environmental Equivalence For each alternative measure allowed under §112 7(a)(2) the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with §112 7(a)(2)			X
(c)(2) and (d)(1) Impracticability For each determination of impracticability of secondary containment pursuant to §112 7(d) the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112 7(d) in lieu of secondary containment			x
(c)(3) Security The Plan contains one of the following  (i) The Plan complies with requirements under §112 7(g) OR  (ii) The Plan complies with the requirements under §112 6(c)(3)(ii) Plan describes how the owner/operator secures and controls access to the oil handling processing and storage areas secures master flow and drain valves prevents unauthorized access to starter controls on oil pumps secures out-of service and loading/unloading connections of oil pipelines addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges			X
(c)(4) Bulk Storage Containers The Plan contains one of the following (ii) The Plan complies with the requirements under §§112 8(c)(6) or 112 12(c)(6) as applicable OR (iii) The Plan complies with the requirements under §112 6(c)(4)(ii)  Aboveground containers supports and foundations tested for integrity on a regular schedule and whenever repairs are made  Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards  The frequency and type of testing and inspections have been determined in accordance with industry standards taking into account container size configuration and design  Container supports and foundations regularly inspected  Outside of containers frequently inspected for signs of deterioration discharges or accumulation of oil inside diked areas			X

Records of inspections and tests maintained	}
(d) Did a PE certify a portion of a qualified facility's self-certified Plan?  If YES, the PE must certify in the Plan that	х
(d)(2)  (i) He/she is familiar with the requirements of 40 CFR Part 112  (ii) He/she or a representative agent has visited and examined the facility  (iii) The alternative method of environmental equivalence in accordance with §112 7(a)(2) or the determination of impracticability and alternative measures in accordance with §112 7(d) is consistent with good engineering practice including consideration of applicable industry standards and with the requirements of 40 CFR Part 112	x
(b)(1) If a PE certified a portion of the Plan did a PE certify any technical amendments that affect this portion of the Plan?	x
Comments	·

App	endix B Container Inspection Fo	orm !
Container ID # 1450	SPC	C Inspection # FY INSP-090182
Maximum capacity (gal) 730,327 bst.	~ Container height (ft) <u>H8</u>	- 10 m
Maximum capacity (gal) トラウ・ランフ bらし	Container diameter (ft) 233	Year Built - 1978
Iry 1	\$ <del>**</del> 7 **	t mel t
Current Status  Active , Standby	Out of service Closed	
Material(s) Stored in Container		rd.
Crude oil Gasoline	Diesel 🔲 Fuel oil 🔲 Jet fuel	☐ Vegetable oil/animal fats grease
Other		
Container Type		>
Vertical Cylindrical	☐ External Floating Roof	☐ Geodesic Dome
Fixed Roof (Vented)	Internal Floating Roof	☐ Spheroid
Coned Roof - (Vented)	Hemispheroid (Noded)	☐ Horizontal Cylindrical
Coned Roof – (Not Vented)	Hemispheriod (Not Noded)	Other
Container Material		
Single Wall Steel	☐ Not Painted	☐ Wooden
Double Wall Steel	Fiberglass Reinforced Plastic	Other
Painted.	☐ Composite (steel with fiberglass)	
Container Construction Welder	☐ 'Riveted ☐ Bolted ☐	Shop Fabricated
Container Cathodic Protection	None Sacrificial Anode(s)	☐ Impressed Current
Inspect container including the base fo	r leaks; specifically looking for-	
Drips, weeps, & stains	Discoloration of tank	Corrosion
Check if present and check if	Check if present and check if	☐ Check if present and check if
*** Acceptable \( \bar{\cappa} \)	Acceptable   '	Acceptable
」 , Or, if Unacceptable 🔲	Or, if Unacceptable	Or, if Unacceptable
Adequate <sub>r</sub>	Adequate Adequate	☐ Adequate
Comment on container inspection		
V 4 6 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		
يروب البراغ و		
Container Foundation Material		
Earthen Material Ring Wall	Concrete (w/impermeable mat	Concrete (w/o
impermeable mat ) 27	Concrete (wimpermeable mat	) Concrete (w/o
☐ Steel ☐ Unknown Other	1	
Inspect container foundation specification	ally looking for	
Cracks	Settling	Gaps (between tank and
Check if present and check if	Check if present and check if	foundation)
Acceptable	\ Acceptable	☐ Check if present and check if
☼ Or, if Unacceptable □	Or, if Unacceptable	Acceptable
		On Allmanartable 🗖
Adequate	Adequate	Or, if Unacceptable   Adequate

in a li

7

Comment on foundation ins					
					• • • • • • • • • • • • • • • • • • • •
Container Piping Constru	ction				
Aboveground	☐ ⊌nderground	Steel (bar	e) Steel (p	ainted)	Steel (galvanized)
☐ Double walled	☐ Copper	☐ Fiberglass	s reinforced plastic		Unknown
Other					
inspect pipes/valves, spec	ifically looking for				
Leaks at joints, seams, val	ives	Discoloration		Corrosi	on
☐ Check if present and if		☐ Check if presen	nt and if	☐ Che	ck if present and if
Acceptable	3	Accepta	ble 🔲		Acceptable
Or, if Unacceptable	]	Or, if Unacce	ptable 🔲	Or,	if Unacceptable
Adequate		Adequate		☐-Ade	quate
Bowing of pipe		Pooling of stored	i material		
☐ Check if present and if		☐ Check if presen	nt and if		
Acceptable [	]	Accepta	ble 🔲		
Or, if Unacceptable	]	Or, if Unacce	ptable 🔲		
Adequate		Adequate			
Comment on piping/valve in	spection				
Secondary Containment T	••				
☑ ∕Dikes/berms/retaining	_	Curbing	☐ Culverts and/or (	gutters	Spill diversion ponds
☐ Sorbent Materials	□ F	Retention Ponds	☐ Weirs and/or boo	oms	
Other - Loc					
Secondary Containment C	hecklist				
☐ Capacity does not appea	ar to be adequate?		☐ Drainage mecha	ınısm mar	nually operated?
☐ Not sufficiently imperviou	us to stored materia	1?	☐ Presence of stor	red maten	al within dike or berm?
Standing water within dil			□ Debns/vegetatio	n within o	r on the dike or berm area?
☐ Erosion or corrosion of d	like or berm?				
Location			. <u></u>		
Comment on containment in	spection.		••••••		
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		

# Not Applicable SPCC CONTINGENCY PLAN REVIEW CHECKLIST

## Appendix C 40 CFR Part 109-Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112 7(d) it is required to provide an oil spill contingency plan following 40 CFR part 109 Items below must be addressed in the Plan and implemented at the facility

SPCC Inspection # FY INSP-090182

109 5-Development and implementation criteria for State local and regional oil removal contingency plans	Yes	No
(a) Definition of the authorities responsibilities and duties of all persons organizations or agencies which are to be involved in planning or directing oil removal operations		
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including		
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges		
(2) A current list of names telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered		
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge and the capability of interconnection with the communications systems established under related oil removal contingency plans particularly State and National plans (e.g., NCP)		
(4) An established prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State local or regional authority		
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including		
(1) The identification and inventory of applicable equipment materials and supplies which are available locally and regionally		
(2) An estimate of the equipment materials and supplies which would be required to remove the maximum oil discharge to be anticipated		
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment materials and supplies to be used in responding to such a discharge		
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including		
(1) Specification of an oil discharge response operating team consisting of trained prepared and available operating personnel		
(2) Pre designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans		
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations		
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge		
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses		
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances		

#### Not Applicable

### **Environmental Equivalence (EE) Checklist**

#### Appendix D Environmental Equivalence Requirements

Complete this Appendix only if the facility has declared "environmental equivalence measures as described in § 112 7(a)(2) Facility owners and operators have the flexibility to deviate from specific rule provisions if the Plan states the reason for nonconformance and if equivalent environmental protection is provided by some other means of SPCC EE declarations must be certified by a PE For EE declarations see portions of checklist referenced earlier

- Control Control	·	
SPCC Citation	SPCC Inspection # FY I	NSP 090182
Is there written documentation validating/explaining rational for no requirements?	on conformance with the SPCC	YES NO
is there written documentation outlining/detailing how the alternation environmental equivalence? and,	ive method achieves	☐ YES ☐ NO
Is the alternative method		
Technically feasible?		YES NO
Logistically sound?		YES NO
Practicable?		☐ YES ☐ NO
Name of Professional Engineer		
License Number State _		
Other PE certification requirements		
Did a PE certify a portion of a qualified facility's self certified Plan?	? 🗌 YES 🔲 NO	
Description of environmental equivalence		
Inspector Comment		